



THE COMMONWEALTH OF MASSACHUSETTS

**DEPARTMENT OF
TELECOMMUNICATIONS & ENERGY**
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April 21, 2006

VIA EMAIL AND USPS

Barbara Ann Sousa
Assistant General Counsel
Verizon Massachusetts
185 Franklin Street, 13th Floor
Boston MA 02110

RE: Petition of the Board of Selectmen of the Town of Middlefield pursuant to
G.L. c. 159, § 24, regarding the quality of Verizon's telephone service,
D.T.E. 06-6

Dear Attorney Sousa:

Enclosed please find the first set of information requests issued by the Department of Telecommunications and Energy ("Department") to Verizon Massachusetts ("Verizon") in the above-captioned matter. In accordance with the procedural schedule, please submit Verizon's responses to the Department and the parties on or before 5:00 p.m, Tuesday, May 9, 2006. If you have any questions regarding the information requests, please contact me at 617-305-3561.

Sincerely,

/s/
Carol M. Pieper
Hearing Officer

Encs.

cc: D.T.E. 06-6 service list (w/encs.)

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

**FIRST SET OF INFORMATION REQUESTS OF THE
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY
TO VERIZON MASSACHUSETTS, D.T.E. 06-6**

Pursuant to 220 C.M.R. § 1.06(6)(c), the Department of Telecommunications and Energy (“Department”) submits to Verizon Massachusetts (“Verizon”) the following Information Requests.

Instructions

The following instructions apply to this set of Information Requests and all subsequent Information Requests issued by the Department in this proceeding.

1. Each request should be answered in writing on a separate, three-hole punch page with a recitation of the request, a reference to the request number, the docket number of the case, and the name of the person responsible for the answer.
2. Do not wait for all answers to be completed before supplying answers. Provide the answers as they are completed.
3. These requests shall be deemed continuing so as to require further supplemental responses if Verizon or its witnesses receives or generates additional information within the scope of these requests between the time of the original response and the close of the record in this proceeding.
4. The term “provide complete and detailed documentation” means:

Provide all data, assumptions and calculations relied upon. Provide the source of and basis for all data and assumptions employed. Include all studies, reports and planning documents from which data, estimates or assumptions were drawn and support for how the data or assumptions were used in developing the projections or estimates. Provide and explain all supporting workpapers.
5. The term “document” is used in its broadest sense and includes, without limitation, writings, drawings, graphs, charts, photographs, phono-records, microfilm, microfiche, computer printouts, correspondence, handwritten notes, records or reports, bills, checks, articles from journals or other sources and other data compilations from which information can be obtained and all copies of such documents that bear notations or other markings that differentiate such copies from the original.
6. If any one of these requests is ambiguous, notify the Hearing Officer so that the request may be clarified prior to the preparation of a written response.
7. Please serve a copy of the responses as follows: (a) one original to Mary L. Cottrell, Secretary of the Department; (b) one copy to all parties; (c) two copies to Carol Pieper, Hearing Officer; and (d) one copy to each Department staff member listed on the current distribution list.

Requests

- DTE-1-1 Please provide a summary of network trouble reports for the Town of Middlefield ("Middlefield" or "Town") for the past two years (i.e., January 1, 2004, through the present) on a monthly basis. Please include a description of the nature of trouble reports for the Town.
- DTE-1-2 Referring to Question DTE-1-1 above, provide a comparison of Middlefield's percentage of trouble reports to the statewide averages for the same two-year period.
- DTE-1-3 Referring to Question DTE-1-1 above, please provide the percentage of trouble reports cleared within 24 hours for both residential and commercial customers. For trouble reports not cleared within 24 hours, please provide the average cleared time for each year for the two-year period. In addition, please provide a comparison of Middlefield's percentage of time to clear trouble reports to the statewide averages for the same two-year period.
- DTE-1-4 Referring to the public hearing transcript at 31, please state whether Verizon captures trouble reports sent through the dispatcher via radio.
- DTE-1-5 Please provide complete and detailed documentation as to the Company's policy for clearing trouble reports on Friday, and state whether the policy is followed in Middlefield.
- DTE-1-6 Please discuss if Verizon has received reports from town officials regarding repeated 911 system failures. If yes, provide complete and detailed documentation of the procedures followed by the Company to address the problem(s).
- DTE-1-7 Referring to the public hearing transcript at 7 and 42, Verizon's representative indicated that Verizon has almost completed (i.e., 95%) a construction project that replaced the main cable feed from the Becket central office to a remote terminal in Middlefield with a new fiber-optic cable. In its reply to comments made at the public hearing, the Company stated that this construction project was completed on April 3, 2006. Please state whether the main cable feed is now operational and fully attached to the Middlefield system.
- DTE-1-8 State whether Verizon intends to undertake any additional maintenance projects to address other concerns expressed by the Town (e.g., leaning poles, dropped wires).
- DTE-1-9 Several residents expressed concern regarding the remote boxes on Town Hill Road and Reservoir Road and specifically asserted that when workers are seen at the boxes, the telephone system goes down (see e.g., public hearing transcript at 11-12, 40). Please state whether Verizon's records show any correlation between work being performed on those facilities and phone problems at the same time in those areas of the town. If yes, state the actions Verizon intends to take to resolve the problem.

- DTE-1-10 In the Company's reply to comments made at the public hearing, Verizon states that its "practices and procedures clearly permit a third party to report an out-of-service condition on another customer's telephone line." Please provide complete and detailed documentation as to the Company's practices and procedures related to third-party reports.
- DTE-1-11 Referring to the public hearing transcript at 16-21, please address the following questions:
- (a) Provide complete and detailed documentation of the Company's policy regarding condemning poles;
 - (b) Provide complete and detailed documentation of Verizon's interactions with the customer at 413-623-0004, including, but not limited to, any record of the customer calling in to report telephone problems and any other notation made in the customer's file; and
 - (c) State whether the Company has repaired the telephone line at 413-623-0004, and if so, state the date the repair took place.
- DTE-1-12 Referring to the public hearing transcript at 34-35, state whether Verizon has addressed the problem of acid leaking on the lines in the box located at Middlefield City Hall. If yes, state the date the problem was corrected.
- DTE-1-13 At the public hearing, residents expressed concern regarding double poles (see e.g., public hearing transcript at 29). Please provide a report on the removal of double poles in Middlefield in the past year (i.e., since January 1, 2005). State whether the removal schedule and the practices followed complied with the Department's requirements in the Report to the Massachusetts Legislature Relative to Reducing the Number of Double Utility Poles Within the Commonwealth, D.T.E. 03-87 (2003).
- DTE-1-14 Referring to the public hearing transcript at 23, please provide complete and detailed documentation of Verizon's policy for responding to trouble reports from third-party vendors (e.g., GroveLine). State whether this policy differs from the Company's policy for responding to trouble reports from residential customers.